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BUREAU OF SOLID WASTE MANAGEMENT
407 South Cameron Street
Harrisburg, Pennsylvania 17101
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February 28, 1984

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U.S. DEPT. OF ENVIRONMENT

Mr. Robin E. Thomas, Manager
Chemistry Laboratory
Hamilton Technology, Inc.
P.O. Box 4787
101 North Queen Street
Lancaster, PA 17604

Re: Part B Permit Application
I.D. # PAD 000800680

Dear Mr. Thomas:

A review of the above referenced permit application has raised the following comments and questions.

1. There seems to be a discrepancy in the volume of sludge holding tank. The tank dimensions are 12' x 12' x 3' which gives a volume of about 3,230 gallons. On drawing #006178, note 5 indicates that the tank shall have a capacity of 2,693 gallons and Page 53, Volume II indicates the tank volume to be approximately 3,000 gallons. This discrepancy must be resolved.
2. The drawing showing the placing of drums over the metal grating does not meet the requirements of Section 75.265(q)(14)(i) in that no aisle space is shown between the rows of drums. Provisions of aisle space is required to insure access for the purpose of inspection containment and remedial action with emergency vehicles.
3. What precautions will be taken to prevent the contents of a leaking drum from entering the sludge holding tank under the metal grating. How will you insure that the drum contents are compatible with the sludge and will not result in an adverse reaction.

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4. It is not clear how the vacuum hose from the tank truck will be lowered through the metal grating into the sludge tank for the purpose of emptying the tank. Will the drums be moved to allow a section of the grating to be removed to allow access to the tank or will some other arrangement be made to accomplish this. Also, a berm should be provided to prevent drums from accidentally rolling off the edge of the grating.
5. Renotification of September 7, 1983 lists F002 and K062 wastes but these are not addressed in the Part A or B Application.
6. Renotification of September 7, 1983 denotes permit-by-rule for treatment. Since the Part A and B Applications were accompanied by a check of \$1,000.00, it has been reviewed for storage permit issuance only.
7. Operational methodology for drum storage does not provide for labelling of the drums and drum closure etc. as required by 75.262(a)(2)(g)(h)(i)(2).
8. Operational methodology for drum storage does not provide for protection of the ignitable wastes from sources of static electrical or mechanical ignition in accordance with 75.264(g)(1).

Please respond to the above comments as soon as possible.

Sincerely,

Abdul R. Merchant
Sanitary Engineer
Harrisburg Regional Office

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U.S. EPA ✓
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